

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

DOUGLAS HANDSHOE)	PLAINTIFF
)	
v.)	CIVIL ACTION NO. 1:14CV159 KS-MTP
)	
DANIEL G. "DANNY" ABEL,)	
CHRIS YOUNT, RAMONA FERNANDEZ,)	
JANEY LAMAR AND STUART SMITH)	DEFENDANTS
LAW CLINIC DBA LOYOLA)	
UNIVERSITY NEW ORLEANS)	

**REPLY OF PLAINTIFF DOUGLAS HANDSHOE IN FURTHER SUPPORT OF
MOTION FOR CONTEMPT**

MAY IT PLEASE THE COURT

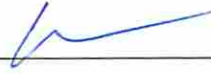
Plaintiff Douglas Handshoe respectfully submits this Reply Memorandum in Further Support of his Motion for Contempt.

As established in Plaintiff's Motion for Contempt [63], Defendant Yount has not complied with the two previous orders of this Honorable Court regarding reimbursement of Plaintiff's Cost of Service pursuant to Rule 4 of the Federal Rules for Civil Procedure. Further, while Mr. Yount managed to overnight this Court his reply to Plaintiff's Motion for Contempt producing in its support duplicate copies of a cashier's check along with a copy of an envelope purportedly addressed to Plaintiff, the envelope that Yount purports to contain a cashier's check bears no postmark nor has it arrived at Plaintiff's physical address as of this date at 2:18 PM local time, which is after time local mail for November 5, 2015 has been delivered at 110 Hall Street, the address which Mr. Yount's envelope was addressed.

Defendant Yount, notwithstanding his reply to Plaintiff's Motion for Contempt [64], remains in contemptuous noncompliance with the previous orders of this Honorable Court and should be made to show cause why he should not be found in Contempt for his willful failure to

satisfy the money judgment that is the subject of this motion or any other relief as determined in the sound discretion of this Honorable Court.

Respectfully submitted this 5th day of November, 2015,



Douglas Handshoe, Pro Se Plaintiff
Post Office Box 788
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on November 5th, 2015 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification of such filing to the following ECF participants:

Edward Hatten (MSB #8859)
Bradley Dean (MSB #101161)
Dukes, Dukes, Keating and Faneca, P.A.
Post Office Drawer W
Gulfport, MS 39502
Phone: (228) 868-1111
Fax: (228) 863-2886
ed@ddkf.com
bdean@ddkf.com
Attorneys for Ramona Fernandez, Janey Lamar and Loyola University New Orleans

Chris Yount
Pro Se
545 Terrace Street
Jefferson, LA 70121

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing to the following via United States Mail:

Daniel G. Abel
Pro Se
C/O The Super 8 Motel / Desai Enterprises
2421 Clearview Parkway, Room 106
Metairie, LA 70001

Respectfully submitted this 5th day of November, 2015,



Douglas Handshoe, Pro Se
Post Office Box 788
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com